

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
Jackson Division

MISSISSIPPI ASSOCIATION OF )  
EDUCATORS, BARBARA PHILLIPS, )  
JAMES THOMAS, DAWN ZIMMERER, ) Civil No. 3:25-cv-00417-HTW-LGI  
L.E. JIBOL, UNITED CAMPUS WORKERS )  
SOUTHEAST LOCAL 3821, MADISYN )  
DONLEY, ALEXIS COBBS, KAREN )  
ADERER, FOSTERING LGBTQ+ )  
ADVOCACY, RESOURCES, )  
ENVIRONMENTS AND WOMEN IN )  
SCIENCE AND ENGINEERING, )  
)

*Plaintiffs,*

v.

BOARD OF TRUSTEES OF STATE  
INSTITUTIONS OF HIGHER LEARNING,  
MISSISSIPPI COMMUNITY COLLEGE  
BOARD, MISSISSIPPI STATE BOARD OF  
EDUCATION, MISSISSIPPI CHARTER  
SCHOOL AUTHORIZER BOARD,

*Defendants.*

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**DECLARATION OF WOMEN IN SCIENCE AND ENGINEERING**

Pursuant to 28 U.S.C. § 1746, Women in Science and Engineering (“WiSE”) makes the following declaration under penalty of perjury:

1. WiSE is a student group at the University of Southern Mississippi (“USM”) in Hattiesburg, Mississippi. It has over 100 members, has existed for over twenty years and receives funds from the school’s state funding. It serves as a mentoring, networking and community outreach group. It seeks to change the perception of what a scientist looks like including by expanding who participates in science, technology, engineering and mathematics (“STEM”) fields. WiSE’s members are predominantly women, and some of its activities like its

conferences are directed at women, but its membership, meetings and activities are open to all.

2. WiSE's goal is to ensure everyone has an opportunity in STEM. Thus ensuring diversity and equity in STEM is part of why WiSE exists. Furthermore, there are pay and opportunity gaps for women pursuing STEM careers. WiSE tries to address these gaps.
3. WiSE is at risk of losing school funding because Defendants or other school officials may conclude that funding WiSE violates the act or that WiSE's activities violate the act.
4. WiSE has in the past held, and intends to continue to hold in the future if they are allowed, conferences and other events which engage students, educators and the Hattiesburg community in the STEM fields in an effort to expand who participates in STEM and to change the perception of what a scientist looks like. These conferences and efforts have focused on concepts and topics which may be or are banned by the law including by Sections 3(b), 3(f), and 3(i) because they focus on female students and scientists, LGBTQ people and others underrepresented in STEM. These conferences were only possible because WiSE received state funds. The law, including Sections 3(b), 3(f), and 3(i), threaten WiSE's ability to hold similar conferences in the future, to receive state funds and even to exist as a USM student group.
5. If WiSE is not able to continue as a USM student group, it will be unable to engage in certain on campus fundraising opportunities. In the past WiSE has used the funds it raised from these on campus fundraisers to provide scholarships for STEM students, primarily women, and to create opportunities for school age girls to experience STEM at the collegiate level. If we cannot do these fundraisers, we cannot provide these scholarships or opportunities anymore. Indeed, the very existence of a scholarship primarily for women is threatened by the law including Sections 3(b), 3(f) and 3(i).

6. The law is vague and unclear, and WiSE is unable to determine what it can and cannot do in the future, whether it can continue to receive state funding and even determine whether it can continue to exist in its present form as a USM student group. For example, WiSE would usually start fundraising now for its fall conference, but because of the law and its vagueness, WiSE is not doing that because it's unclear if WiSE could even host a conference to benefit women or women students. Planning a conference takes a lot of time and effort, and with the lack of clarity, expending that effort does not make sense. WiSE will thus likely be unable to host a fall conference this year because of the lack of clarity created by the law.
7. WiSE may have to self-censor because of the law, including by not holding conferences or by changing the content of them. WiSE, which includes "Women" in its group name, may even have to change its name.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed: June 16, 2025

A handwritten signature in black ink, appearing to read 'Carmen Dunn', is written over a horizontal line.

Women in Science and Engineering  
Carmen Dunn  
President